

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	CASE NO.
UTILITIES COMPANY FOR AN ADJUSTMENT OF	)	2018-00294
ITS ELECTRIC RATES	)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO KENTUCKY SCHOOL BOARDS ASSOCIATION

Kentucky School Boards Association (KSBA), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on February 14, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KSBA shall make timely amendment to any prior response if KSBA obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KSBA

fails or refuses to furnish all or part of the requested information, KSBA shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, KSBA shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Ronald L. Willhite (Willhite Testimony), page 3, lines 29–30. Provide support, other than the mathematical estimation provided, that \$100,000 of promised annual savings was not provided.

2. Refer to the Willhite Testimony, page 4, line 22. Provide support as to why an average coincidence factor of 5.0 percent lower is significant.

3. Refer to the Willhite Testimony, pages 6–7. Mr. Willhite provided a Loss of Load Probability analysis for the months of July and August. Provide a similar analysis for the months of January, February, June, and September.

4. Refer to the Willhite Testimony, page 9, lines 10–13.

a. Provide the estimated revenue that Rate Classes SPS and STOD would generate in the forecast test year if reinstated on a permanent basis without any monetary cap.

b. Provide the estimated revenue impact on Rates PS-secondary and TODS if Rates Classes SPS and STOD were reinstated.

5. Refer to the Willhite Testimony, page 9, lines 21–24.

a. Provide support for the 7.1 percent increase for schools.

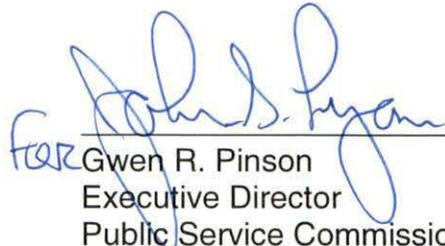
b. Provide support for the 7.0 percent increase for schools.

6. Refer to the Willhite Testimony, page 10, line 2.

a. Explain why a threshold of 200 kW was chosen.

b. Provide the number of schools that would be moved from rate TODS to Rate PS using the proposed 200 kW threshold.

c. Provide the average revenue impact of moving schools from Rate TODS to Rate PS.

  
Gwen R. Pinson  
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DATED JAN 31 2019

cc: Parties of Record

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